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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

IOLA FAVELL, SUE ZARNOWSKI,
MARIAH CUMMINGS, and AHMAD
MURTADA, *on behalf of themselves*
and all others similarly situated,

Plaintiffs,

UNIVERSITY OF SOUTHERN
CALIFORNIA.

Defendant.

Case No. CV 23-846-GW-MARx;
Case No. CV 23-3389-GW-MARx

CLASS ACTION

ORDER APPROVING PLAINTIFFS' PROPOSED CLASS NOTICE PLAN

1 **ORDER APPROVING PLAINTIFFS' PROPOSED CLASS NOTICE PLAN**

2 Having reviewed Plaintiffs' proposed class notice plan, the Court approves
3 Plaintiffs' class notice plan as submitted as it comports with due process
4 requirements and will sufficiently provide notice to the Class. As requested, the
5 Court names Angeion Group LLC as notice administrator. Within seven (7) days of
6 this Order, Defendant University of Southern California will provide to Angeion
7 Group LLC contact information for the Class, including (1) first and last name; (2)
8 last known email address, and (3) last known mailing address. Class notice shall be
9 completed by August 31, 2024, and the opt-out deadline is October 31, 2025.

10 This Order shall constitute a "judicial order" within the meaning of the Family
11 Educational Rights and Privacy Act, 20 U.S.C. § 1232g and 34 C.F.R. § 99.31(a)(9),
12 sufficient to permit University of Southern California to provide Class Members'
13 contact information to the Notice Administrator. The Court further rules that the
14 Notice Plan outlined in Plaintiffs' motion and the proposed Notice Form constitutes
15 a reasonable effort per 34 C.F.R. § 99.31(a)(9)(ii) to notify eligible students (or their
16 parents) of this order sufficiently in advance of the potential disclosure to Class
17 Counsel of contact information and other information maintained by the University
18 of Southern California for the academic terms of 2017 through 2022 to Class
19 Counsel to allow the student (or parent) an opportunity to seek protective action,
20 including filing a motion to quash with this Court, such that FERPA privacy concerns
21 shall not serve as a bar to the production of any of the following records of Class
22 Members to Class Counsel as part of discovery and subject to any other orders of
23 this Court, including:

24 1. Name, Contact Information (including Email and phone addresses);
25 2. Dates and Program of Attendance;
26 3. Degree obtained;
27 4. Graduation and Enrollment Dates;

- 1 5. Tuition Assessed;
- 2 6. Tuition Paid;
- 3 7. Fees Assessed;
- 4 8. Fees Paid;
- 5 9. The amount and source of scholarships, grants, or other third-party
6 payments toward tuition and fees; and
- 7 10. Communications between each student and USC or its marketing
8 partner 2U.

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10 **IT IS SO ORDERED.**

11
12 July 18, 2025
13 Date



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HON. GEORGE H. WU,
United States District Judge